



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

February 2, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Fort Wayne Pools, Inc. / 003-16985-00071

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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*Frank O'Bannon*  
Governor

*Lori F. Kaplan*  
Commissioner

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**February 2, 2004**

Mr. Galen Mann  
Fort Wayne Pools, Inc.  
510 Sumptner  
Fort Wayne, Indiana 46804

Re: 003-16985-00071  
First Significant Permit Modification to  
Part 70 Permit No.: T003-6933-00071

Dear Mr. Mann:

Fort Wayne Pools, Inc. (Fort Wayne Pools) was issued a Part 70 Operating Permit on December 4, 2002, for a fiberglass reinforced plastic pool steps, filler panels and pool supports manufacturing plant. Fort Wayne Pools petitioned for review of the permit on January 3, 2003. This petition was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-2993. This permit revision shows the changes made to the permit in order to settle issues raised by the petition for review.

The modification consists of changes to conditions C.15, D.1.6, D.1.11, D.1.12 and D.1.13. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark A. Derf, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Mark Derf at extension (3-6870), or dial (317) 233-6870.

Sincerely,  
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
PD/mad

cc: File - Allen County  
U.S. EPA, Region V  
Allen County Health Department  
Air Compliance Section Inspector – Jennifer Dorn  
Compliance Data Section - Karen Nowak  
Administrative and Development



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## **PART 70 OPERATING PERMIT SIGNIFICANT PERMIT MODIFICATION OFFICE OF AIR QUALITY**

**Fort Wayne Pools, Inc.  
6930 Gettysburg Pike  
Fort Wayne, Indiana 46804**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-6933-00071	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 4, 2002  Expiration Date: December 4, 2007
First Significant Permit Modification No.: T003-16985-00071	
Pages Affected: 3, 24, 35-37	
Issued by: Original signed by Paul Dubenetzky	Issuance Date: February 2, 2004

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Paul Dubenetzky, Branch Chief Office of Air Quality	Expiration Date: December 4, 2007
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**Testing Requirements [326 IAC 2-7-6(1)]**

C.8 Performance Testing [326 IAC 3-6]

**Compliance Requirements [326 IAC 2-1.1-11]**

C.9 Compliance Requirements [326 IAC 2-1.1-11]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports  
[326 IAC 2-7-5] [326 IAC 2-7-6]C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - One (1) Resin Chop Spray Booth and One (1) Paint Spray Booth****Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

D.1.2 Volatile Organic Compounds (VOC)

D.1.3 Hazardous Air Pollutants (HAP) [326 IAC 20-25]

D.1.4 Work Practice Standards [326 IAC 20-25-4]

D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

D.1.6 Particulate [326 IAC 6-3-2(d)]

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.1.8 Volatile Organic Compounds (VOC)

D.1.9 VOC Emissions

D.1.10 Hazardous Air Pollutants (HAP) [326 IAC 20-25-5]

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.1.11 Monitoring

D.1.12 Training Requirements

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.13 Record Keeping Requirements

D.1.14 Record Keeping Requirements [326 IAC 20-25-6]

D.1.15 Reporting Requirements

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.



- (1) All production and tooling resins that contain HAPs.
  - (2) All production and tooling gel coats that contain HAPs.
  - (3) Waste resins and gel coats that contain HAPs.
  - (4) Cleaning materials, including waste cleaning materials.
  - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

#### D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the resin chop and coping paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the resin chop and coping paint booths shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer-s specifications.

#### D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### **Compliance Determination Requirements**

#### D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.9 VOC Emissions

Compliance with condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 month Period.

#### D.1.10 Hazardous Air Pollutants (HAPs) [326 IAC 20-25-5]

Pursuant to 326 IAC 20-25-5(c), compliance with the HAP monomer content and usage limitations specified in condition D.1.3 shall be determined using one (1) of the following:

- (a) The manufacturer-s certified product data sheet.
- (b) The manufacturer-s material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:

- (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coats to require that the procedure be performed on uncatalyzed resin or gel coat samples.
- (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (3) Upon written application by the source, the commissioner may approve an alternative test method.

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with condition D.1.3.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.11 Monitoring**

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the emission unit EU-12 while in operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Response Plan- Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **D.1.12 Training Requirements**

- (a) The Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the facility listed in EU-12 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1:
- (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the month of use;
  - (3) The cleanup solvent usage for each month; and
  - (4) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly filter inspections and those additional measures prescribed by the Preventative Maintenance Plan for spray paint booth EU-12.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain a copy of the operator-training program, training records, and those additional measures prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.14 Record Keeping Requirements [326 IAC 20-25-6]

- (a) Pursuant to 326 IAC 20-25-6(a), on and after January 1, 2002, the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of 326 IAC 20-25. Examples of such records are as follows:
- (1) Purchase orders.
  - (2) Invoices.
  - (3) Material safety data sheets (MSDS).
  - (4) Manufacturer-s certified product data sheets.
  - (5) Calculations.
  - (6) Other records to confirm compliance.
- (b) Pursuant to 326 IAC 20-25-6(b), the Permittee shall maintain records of all information, including all reports and notifications required by 326 IAC 20-25. Such records shall be recorded in a form suitable and readily available for inspection and review. Except as provided in 326 IAC 20-25-8(d), the records shall be retained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.

#### D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be

submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the Aresponsible official® as defined by 326 IAC 2-7-1(34).

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the  
Technical Support Document (TSD) for a Significant Permit Modification to a  
Part 70 Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Fort Wayne Pools, Inc.</b>
<b>Source Location:</b>	<b>6930 Gettysburg Pike, Fort Wayne, Indiana 46804</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>3083</b>
<b>Operation Permit No.:</b>	<b>T003-6933-00071</b>
<b>Operation Permit Issuance Date:</b>	<b>December 4, 2002</b>
<b>Modification Permit No.:</b>	<b>003-16985-00071</b>
<b>Permit Reviewer:</b>	<b>Mark A. Derf</b>

On March 3, 2003, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette in Fort Wayne, Indiana stating that Fort Wayne Pools, Inc. had appealed its Part 70 Operating Permit (T003-6933-00071) to operate a fiberglass reinforced plastic pool steps, filler panels and pool supports manufacturing facility. The notice also states OAQ proposes to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 3, 2003, Ms. Caroline Yates and Ms. Terri Haff of the Westlawn Civic Association submitted comments on the proposed significant permit modification for Fort Wayne Pools. The following is a summary of the comments and responses to those comments.

**Comment 1:**

It has been requested that the compliance monitoring requirements for daily and monthly inspections in Section D.1.11 be reinstated in the permit. The commenter has concerns that the source has consistently disregarded the safety of its own workers by sloppy handling of records and other safety issues. The commenter has submitted information to IDEM OAQ in the past concerning the record keeping practices and air quality testing results.

The commenter believes that the source must demonstrate a commitment to the compliance requirements. The training section would be acceptable only in addition to the compliance monitoring requirements and not in lieu of the existing compliance monitoring requirements.

**Response to Comment 1:**

IDEM OAQ has reviewed the comments received and are only able to address those comments

related to the proposed modification as a result of the appeal that was filed concerning the Title V permit. The commentor had requested that the addendum to the Title V permit be made a permanent record of the permit. The addendum is a permanent record of the Title V permit and is attached as part of the permit package for reference purposes. Subsequent source or permit modifications will contain information concerned with the propose modification.

IDEM OAQ inspectors routinely inspect the facility and compliance records are maintained to demonstrate compliance with any and all permit conditions. Any investigation dealing with personnel issues would not fall under IDEM jurisdiction.

As a result of the comments received concerning the proposed permit modification, IDEM OAQ has reviewed condition D.1.11 under the compliance monitoring requirements. OAQ has reviewed the work and recordkeeping practices of Fort Wayne Pools, taken from air compliance inspection reports. As a result of the inspections and the documented violations of 326 IAC 20-25-4(6)(c) and 326 IAC 20-25-8(b) that were observed on more than one occasion, OAQ will revise the condition, leaving the training requirements in condition D.1.12 but continue to require weekly inspections of the filters on the air atomization coping paint spray booth (EU-12). The fiberglass resin chop spray booth (EU-7) will not be required to have weekly inspections since the emissions are not from painting. Upon inspection of the surface coating booth stacks S-7 and S-12, observations for overspray are not necessary due to the configuration of the building and placement of the stacks. Therefore, the weekly observations of overspray for stack S-7 and S-12 will not be required. However, the requirement for Compliance Response Plan for overspray will remain if overspray is noticeable.

Conditions D.1.11 and D.1.12 have been revised and all corresponding conditions renumbered to read as follows:

#### D.1.11 Monitoring

(a) ~~Daily~~ Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with the emission unit EU-12 while in operation. ~~To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S-7 and S-12 while one or more of the booths are in operation.~~ The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps Response Plan- Preparation, Implementation, Records, and Reports, shall be considered a violation-deviation of this permit.

~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C- Compliance Monitoring Plan - Failure to Take Response Steps~~ Response Plan- Preparation, Implementation, Records, and Reports, shall be considered a violation of this

~~permit.~~

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### D.1.12 Training Requirements

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- (a) The Permittee shall implement an operator-training program.
- (1) All spray booth operators or employees that perform maintenance at the ~~facilities~~ facility listed in ~~EU-7 and~~ EU-12 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (3) All operators shall be given refresher training annually.

#### **OAQ's REVISIONS**

Upon further review, the OAQ has decided to make the following revisions to the permit as a result of comments received during the public notice period and further review of compliance language in terms of consideration of deviations of permit conditions. (bolded language has been added, the language with a line through it has been deleted).

#### D.1.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1:
- (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
- (2) A log of the month of use;
- (3) The cleanup solvent usage for each month; and
- (4) The weight of VOC emitted for each compliance period.

Fort Wayne, Indiana  
T003-6933-00071  
Permit Reviewer: SCP/EVP

Modified by: Mark A. Derf

- (b) To document compliance with Conditions ~~D.1.10 and~~ D.1.11, the Permittee shall maintain a log of ~~weekly overspray observations, daily and monthly~~ weekly filter inspections ~~copy of the operator training program, training records,~~ and those additional ~~inspections~~ measures prescribed by the Preventive Maintenance Plan for spray paint booth EU-12.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain a copy of the operator training program, training records, and those additional measures prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

In addition, OAQ has decided to make the following revisions to the permit as a result of further review of compliance language in terms of consideration of deviations of permit conditions.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would



necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall ~~constitute a violation~~ be considered a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B- Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

## Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification as the resolution to the appeals be approved.

## Conclusion

This permit modification shall be subject to the conditions of the attached permit 003-16985-00071.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Fort Wayne Pools, Inc.</b>
<b>Source Location:</b>	<b>6930 Gettysburg Pike, Fort Wayne, Indiana 46804</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>3083</b>
<b>Operation Permit No.:</b>	<b>T003-6933-00071</b>
<b>Operation Permit Issuance Date:</b>	<b>December 4, 2002</b>
<b>Modification Permit No.:</b>	<b>003-16985-00071</b>
<b>Permit Reviewer:</b>	<b>Mark A. Derf</b>

The Office of Air Quality (OAQ) has reviewed petitions for review for Fort Wayne Pools, Inc. relating to a fiberglass reinforced plastic pool steps, filler panels and pool supports manufacturing facility.

#### **History**

Fort Wayne Pools, Inc. (Fort Wayne Pools) was issued a Part 70 operating permit (003-6933-00071) on December 4, 2002. Fort Wayne Pools petitioned for review of the Part 70 operating permit on January 3, 2003. This petition was filed in the Office of Environmental Adjudication under Cause Number 03-A-J-2993. This permit modification shows the changes made to the Part 70 operating permit in order to settle issues raised by the petition for review. A significant permit modification has been drafted due to the fact that changes in the permit include dry filter training, recordkeeping and reporting requirements.

The appeal requests follow with the deleted language in the permit appearing as ~~strikeouts~~, and the new or revised language appearing underlined in the responses. In addition to any changes made to address appealed provisions, the permit has updated the Table of Contents and page numbering as needed.

#### **Appeal Item 1: [Part 70 operating permit appeal, Cause No. 03-A-J-2993]**

The Petitioner objects to condition C.15 (Compliance Response Plan – Preparation, Records, and Reports). The Petitioner states the condition should be corrected to state that the failure to take reasonable response steps is a deviation and not a violation of the permit.

**Response 1:**

IDEM OAQ is unable to grant the requested change to condition C.15 (Compliance Response Plan – Preparation, Records, and Reports). 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements and determine no permit conditions are violated. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the sources compliance, even where the applicable requirement does not require periodic testing or instrumental monitoring. The requirement that the permit contain operational requirements and limitations that assure compliance with all applicable requirements, coupled with the rule requirements for compliance monitoring, provides all the necessary authority for this permit requirement. Failure to comply with the compliance response steps if compliance with an applicable requirement is not achieved would result in a violation of the permit. Therefore, no changes will be made to condition C.15 as a result of this petition for review.

**Appeal Item 2:** [Part 70 operating permit appeal, Cause No. 03-A-J-2993]

The Petitioner objects to Condition D.1.11 (Monitoring) and D.1.12 (Record keeping). The Petitioner states that operator training requirements should replace the monitoring requirements in condition D.1.11.

**Response 2:**

IDEM OAQ has reviewed the requested changes to conditions D.1.11 (Monitoring) and D.1.12 (Record keeping). Revisions have been made to Condition D.1.11 of the Title V operating permit to address the Petitioner's objection to the Monitoring Requirements. These revisions are made according to the new standards for surface coating facilities and updated in this permit modification. IDEM OAQ has revised the process weight rate rule (326 IAC 6-3-2(d)) in order to determine particulate matter emission limitations from surface coating facilities that affect conditions D.1.10. The revised rule language has been incorporated into the permit which will affect condition D.1.10. However, condition D.1.10 should be listed under emission limitations and standards. Therefore, conditions D.1.10, D.1.11 and D.1.12 have been renumbered and revised as follows:

**D.1.106 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) paint booths shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.11 ~~Monitoring~~ Training Requirements**

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S-7 and S-12 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response~~

~~Steps, shall be considered a violation of this permit.~~

(a) The Permittee shall implement an operator-training program.

- (1) All spray booth operators or employees that perform maintenance at the facilities listed in EU-7 and EU-12 shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (3) All operators shall be given refresher training annually.

~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(c)~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1:
  - (1) The usage by weight and monomer content of each resin and gel coat. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the month of use;
  - (3) The cleanup solvent usage for each month; and
  - (4) The weight of VOC emitted for each compliance period.
- (b) To document compliance with Conditions D.1.106 and D.1.11, the Permittee shall maintain

a ~~log of weekly overspray observations, daily and monthly inspections~~ copy of the operator-training program, training records, and those additional ~~inspections~~ measures prescribed by the Preventive Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Modification as the resolution to the appeals be approved.

### **Conclusion**

This permit modification shall be subject to the conditions of the attached permit 003-16985-00071.